

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON  
HAMMONDS, BRENDA F. WATKINS,  
LIMESTONE UNIVERSITY, MG  
FREESITES, LTD., d/b/a PORNHUB.COM,  
MG FREESITES II LTD., MINDGEEK  
S.A.R.L., MINDGEEK USA, INC., MG  
BILLING LTD., and HAMMY MEDIA LTD.  
d/b/a XHAMSTER.COM, TRAFFICSTARS  
LTD., WISEBITS LTD, XHAMSTER IP  
HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**TRAFFICSTARS, LTD.'S MOTION TO  
DISMISS PURSUANT TO FRCP 12(b)(2)  
and 12(b)(6)**

Pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6), Defendant TrafficStars, Ltd. ("TL") respectfully moves for the Court to dismiss Plaintiffs' Fifth Amended Complaint ("FAC") as it applies to TL because: (a) the Court lacks personal jurisdiction over TL, a foreign company incorporated in Cyprus with a principal place of business in Limassol, Cyprus; and (b) the FAC fails to state a claim upon which relief may be granted.

In support of this Motion, TL relies on the accompanying Memorandum of Law.

Respectfully Submitted,

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*Attorneys for TrafficStars, Ltd.*

December 23, 2022

Greenville, South Carolina